

AUG 23 1974

THE OHIO RUBBER CO
ELDEN A. SPENCER
BEN HUR AVE
WILLOUGHBY

0243160174 P006

OHIO 44094

CERTIFIED MAIL

OhioEPA

John J. Gilligan
Governor
Dr. Ira L. Whitman
Director

Dear

Enclosed are variance(s) which allow you to operate the described air contaminant source(s) in violation of certain regulations of the Ohio Environmental Protection Agency while you take the prescribed steps to correct these problem(s). Because these variance(s) contain several conditions and restrictions, I urge you to read them carefully.

Under Ohio Revised Code, Section 3704.04, 119.06, and 119.07, these order(s) will take effect on the date indicated unless you or any other person aggrieved or adversely affected by the action requests or has requested an adjudication hearing within thirty (30) days of the date of issuance. At an adjudication hearing you may appear in person, or be represented by your attorney or by such other representative as is permitted to practice before this Agency, or you may present your position, arguments, or contentions in writing and at the hearing you may present evidence and examine witnesses appearing for and against you. Requests for hearings shall be in writing and shall specify the issues of fact and law to be contested. Requests for hearings shall be sent to the Division of Authorization and Compliance in Columbus, Ohio.

The Agency may withdraw these variance(s) at any time before the variance(s) take effect.

If you have any questions, please contact the air pollution control agency to whom you submitted your application.

Sincerely,



Ira L. Whitman, Ph. D.
Director

AP-PS-203
4/10/73

Variance to Operate an Air Contaminant Source Terms and Conditions

Date of Issuance 08/23/74Effective Date 09/23/74Application No. 0243160174P006

This document is issued to: THE OHIO RUBBER CO
BEN HUR AVE
WILLOUGHBY

OHIO 44094

and constitutes a variance to operate:
RUBBER RECLAIM DIGESTERS;
BLDG. "N".

This variance authorizes the above-described air contaminant source to operate in violation of the regulation(s) specified in the compliance time schedule of the Ohio Environmental Protection Agency. This variance is issued subject to the applicant's affirmation that the applicant will bring said source into compliance with all State and Federal air pollution laws and regulations in accordance with the compliance time schedule, which is an integral part of this variance.

The issuance of this variance does not constitute certification by the Director or the State of Ohio that, if implemented in accordance with the compliance schedule, the control strategy described therein will bring this air contaminant source into compliance with applicable State and Federal air pollution laws and regulations, including emission standards.

This variance authorizes the above-described air contaminant source to operate in violation only of those regulations specifically enumerated in this variance. Possession of this variance shall not relieve the above-described air contaminant source from the duty to continuously comply with all other applicable State and Federal air pollution laws and regulations.

The following terms and conditions are hereby expressly incorporated into this variance:

Condition No. 1

This variance shall expire on 07/01/78. This variance is renewable subject to the requirements of Regulation AP-9-04(f) of the Ohio Environmental Protection Agency, but shall not be renewed if any of its terms and conditions are violated during its effective period. If the attached compliance schedule extends beyond the date indicated above, and unless the Director is notified to the contrary, this variance will be automatically considered for renewal sixty (60) days before this expiration date.

Condition No. 2

A permit fee in the amount of \$ 150 is remitted within fifteen (15) days of the effective date of this variance.

Condition No. 3 (This condition is applicable if checked: ☐)

Upon declaration of an Air Pollution Alert, Warning or Emergency Episode this air contaminant source will follow those emission reduction procedures enumerated in the Emergency Action Plan approved by the Director for this source.

Condition No. 4

During the effective period of this variance, emissions from this air contaminant source shall not exceed those generated when this source is operated under the conditions described in the application for this variance.

Condition No. 5

If the compliance time schedule will result in compliance on or before December 31, 1973 the following requirements must be met:

Within five (5) days after the scheduled achievement date of each of the following increments of progress, the person responsible for submitting an application for a variance shall certify to the Director whether each of the following increments of progress has been achieved:

- (a) Completion of implementation of the compliance schedule, and start-up of the control system;
- (b) Performance testing (unless specific exemption is obtained under the provisions of Condition No. 6 of this variance);
- (c) Submission of performance test analyses and results.

In addition to these reporting requirements, unless the Director specifies otherwise, the variance holder shall file interim reports every four months with the Director in the manner required by Regulation AP-9-04(e). These reports shall demonstrate, to the satisfaction of the Director, that the variance holder is making consistent progress towards completion of the work enumerated on the compliance schedule.

If the compliance time schedule will result in compliance after December 31, 1973, the following requirements must be met:

Within five (5) days after the scheduled achievement date of each of the following increments of progress, the person responsible for submitting an application for a variance shall certify to the Director whether each of the following increments of progress has been achieved:

- (a) Date of submittal of Source's final control plans to the Ohio Environmental Protection Agency;
- (b) Date on which contracts for emission control systems or process modification are awarded or date on which orders are issued for the purchase of component parts to accomplish emission control or process modification;
- (c) Date of initiation of on-site construction or installation of emission control equipment or process change;
- (d) Date on which on-site construction or installation of emission control equipment or process modification is completed;
- (e) Performance testing (unless specific exemption is obtained under the provisions of Condition No. 6 of this variance);
- (f) Submission of performance test analyses and results;
- (g) Date on which final compliance is achieved.

In either case, unless the Director specifies otherwise, the variance holder shall also file interim reports every four (4) months with the Director in the manner required by Regulation AP-9-04(e). These reports shall demonstrate, to the satisfaction of the Director, that the variance holder is making consistent progress towards completion of the work enumerated on the compliance schedule.

Condition No. 6

No permit to operate the above-described air contaminant source shall be granted until the applicant demonstrates to the satisfaction of the Director that the completed control strategy brings the above-described air contaminant source into compliance with all applicable requirements of State and Federal air pollution laws and regulations. Unless written exemption is ob-

tained from the Director, the demonstration requirement of this paragraph shall be by performance testing of the source, in accordance with procedures approved by the Director.

Condition No. 7

The Director of the Ohio Environmental Protection Agency, or his authorized representative, may enter upon the premises of the source operation at any reasonable time and subject to safety requirements of the person in control of the premises for the purpose of making inspections, conducting tests, and determining compliance with all applicable State and Federal air pollution laws and regulations and the terms and conditions of this variance.

Condition No. 8

This variance shall be subject to revocation for any of the reasons specified in Regulation AP-9-04(h).

Condition No. 9 (This condition is applicable if checked: ☐)

This variance is subject to the supplementary condition(s) attached.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Ira L. Whitman, Ph. D.

Director

450 East Town Street
Box 1049
Columbus, Ohio 43216

- VARIANCE PERMIT COMPLIANCE TIME SCHEDULE -

The following COMPLIANCE TIME SCHEDULE is a part of the permit application for:

Rubber Reclaim Digesters
Bldg. "N"

(describe source equipment)

Located at the:

Ohio Rubber Company
Ben Hur Avenue
Willoughby, Ohio 44077

This time schedule applies to compliance with Regulation AP-5-07, EP-11-07, and EP-11-11.

(indicates facility name and location)

Indicated below are the steps, or milestones, which will be taken by the above air contaminant source and the time required (in months) to complete each step as well as the time required for the total program. This COMPLIANCE TIME SCHEDULE will become a condition of the variance permit upon approval.

<u>Milestone</u>	<u>Beginning Date:</u> 7-1-74	<u>Period (months)</u>
1. Submission of final control plans for source		5
2. Awarding of contracts for emission control systems or issuing of purchase orders for component parts to accomplish emission control or process modification		5
3. Initiation of on-site construction or installation of emission control equipment or process modification		11
4. Completion of on-site construction or installation of emission control equipment or process modification		12
5. Achievement of final compliance with all applicable State and Federal statutes and regulations		12

Prepared by: Sam M. George
Date Prepared: July 1, 1974

NEC